

Exhibit A

<h2 style="text-align: center; margin: 0;">CHARGE OF DISCRIMINATION</h2> <p style="font-size: small; margin: 5px 0;">This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;">440-2023-09028</div> </div>
Illinois Department of Human Rights and EEOC	
<i>State or local Agency, if any</i>	

Name (indicate Mr., Ms., Mrs., Mx.) Mr. Richard Snyder	Home Phone (Incl. Area Code) [REDACTED]	Date of Birth [REDACTED]
Street Address [REDACTED]	City, State and ZIP Code [REDACTED]	Email Address [REDACTED]
Street Address c/o Nathan Volheim, Sulaiman Law Group, 2500 S. Highland Ave., #200, Lombard, IL 60148 (employment@sulaimanlaw.com)	City, State and ZIP Code	Email Address
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)		
Name Thorntons LLC	No. Employees, Members 15+	Phone No. (Include Area Code) N/A
Street Address 180 East Rollins Road	City, State and ZIP Code Round Lake Beach, IL, 60073-3806	Email Address tammiehafenbrak@bp.com
Name	No. Employees, Members 15+	Phone No. (Include Area Code)
Street Address	City, State and ZIP Code	Email Address
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap; justify-content: space-around; margin-top: 10px;"> <div><input type="checkbox"/> RACE</div> <div><input type="checkbox"/> COLOR</div> <div><input type="checkbox"/> SEX</div> <div><input type="checkbox"/> RELIGION</div> <div><input type="checkbox"/> NATIONAL ORIGIN</div> <div><input checked="" type="checkbox"/> RETALIATION</div> <div><input checked="" type="checkbox"/> AGE</div> <div><input type="checkbox"/> DISABILITY</div> <div><input type="checkbox"/> GENETIC INFORMATION</div> <div><input type="checkbox"/> OTHER (Specify below.)</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Earliest 1/2023 Latest 6/2023 </div> <div style="text-align: center; margin-top: 10px;"> <input type="checkbox"/> CONTINUING ACTION </div>
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I, Richard Snyder, was hired at Thorntons LLC as a general manager on or around January 2022 until I was constructively discharged on or about June 16, 2023 due to age-based discrimination.		
The following is a non-exhaustive list of incidents of the age-based harassment and discrimination I was subjected to:		
On or around January 2023, I made a formal request to speak with Elee Ecofee, the regional manager, to discuss my plans for staffing my team. Regrettably, Elee dismissed my request without acknowledging my concerns or proposals. She assured me that she would get back to me via phone call but never followed through.		
From on and around February 2023 onwards until my constructive discharge, I consistently raised the urgent need for more employees at my location due to severe understaffing. However, every time I approached HR, I was met with vague responses, simply stating that they were "handling it." I observed that other General Managers, who were younger than me and in their 30s, had no issues getting HR to promptly approve their requests for new hires. In stark contrast, HR specifically asked me to stop submitting information for potential new employees, which was disheartening and revealed a clear disparity in treatment based on age.		
On or about June 14, 2023, I had another discussion with Elee, during which she unfairly placed the blame on me for the store's current situation, despite my efforts to cope with the lack of adequate staffing. Consequently, she issued me a write-up as a form of punishment.		
Then, that same day, on or about June 14, 2023, I was shocked when Elee informed me that I had to be present in the store on a day for which I had already been granted approved time off. She cruelly presented me with an ultimatum, forcing me to choose between showing up or quitting. Under considerable pressure, I felt compelled to resign on or about June 16, 2023, effectively experiencing a constructive discharge. Interestingly, another manager named [REDACTED] (LNU) was presented with the same ultimatum but faced no repercussions when he refused to show up during his designated time off. Shortly after my departure, the company swiftly hired five new employees, further implying that the lack of support and resources provided by Thorntons LLC was intentional and a clear example of age discrimination.		
Thus, I have been harassed and discriminated against because of my age, in violation of the Age Discrimination in Employment Act of 1967, as amended and (775ILCS 5/) Illinois Human Rights Act.		

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements
I declare under penalty of perjury that the above is true and correct.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="text-align: center;"> 08 / 07 / 2023 <hr style="width: 100px; border: 0.5px solid black;"/> <small>Date</small> </div> <div style="text-align: center;"> <hr style="width: 100px; border: 0.5px solid black;"/> <small>Charging Party Signature</small> </div> </div>	SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE <small>(month, day, year)</small>

CHARGE OF DISCRIMINATION

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Charge Presented To: _____ Agency(ies) Charge No(s): _____

☐ FEPA

☒ EEOC

Illinois Department of Human Rights

and EEOC

State or local Agency, if any

THE PARTICULARS ARE *(If additional paper is needed, attach extra sheet(s))*:

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Date

Charging Party Signature

NOTARY – *When necessary for State and Local Agency Requirements*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

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CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. FORM NUMBER/TITLE/DATE. EEOC Form 5, Charge of Discrimination (11/09).

2. AUTHORITY. 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.

3. PRINCIPAL PURPOSES. The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.

4. ROUTINE USES. This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.

5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION. Charges must be reduced to writing and should identify the charging party and respondent and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, ADA, or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, and Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.



Audit trail

Title	Final EEOC Charge- Please review and sign
File name	EEOC Charge Draft...orney review).pdf
Document ID	d722cb0441f76f2f8905e3345a0c302e07915f6a
Audit trail date format	MM / DD / YYYY
Status	● Signed

Document History



SENT

08 / 07 / 2023

17:18:51 UTC

Sent for signature to Richard Snyder [REDACTED]
from cnieves@sulaimanlaw.com
IP: 50.221.176.242



VIEWED

08 / 07 / 2023

17:26:33 UTC

Viewed by Richard Snyder [REDACTED]
IP: 73.208.5.222



SIGNED

08 / 07 / 2023

17:27:56 UTC

Signed by Richard Snyder [REDACTED]
IP: 73.208.5.222



COMPLETED

08 / 07 / 2023

17:27:56 UTC

The document has been completed.